



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

November 20, 2012

NASA Wallops Flight Facility  
PFRR EIS – Joshua Bundick, Manager  
Mailstop: 250.W  
Wallops Island, Virginia 23337

Re: EPA comments on the NASA Sounding Rockets Program at the Poker Flat Research Range (PFRR), Alaska Draft Environmental Impact Statement, EPA Project #11-017-NAS.

Dear Mr. Bundick:

Thank you for the opportunity to review the Draft Environmental Impact Statement (EIS) for the Sounding Rockets Program at the Poker Flat Research Range in interior Alaska (CEQ # 20120308). We have reviewed the EIS in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act.

Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA. We have given this EIS an overall rating of LO (Lack of Objections). A description of our rating system is enclosed.

Although the NASA did not identify a preferred alternative, we believe, based on the analysis in the EIS, that Alternative 4-Maximum Cleanup Search and Recovery with Restricted Trajectories would be the environmentally preferable alternative, specifically due to the reduction of potential impacts to Wild and Scenic River segments and the Mollie Beattie Wilderness Area. We encourage the selection of Alternative 4 as the preferred alternative in the Final EIS.

We recognize that all action alternatives result in relatively minor impacts, with the exception of the generation of solid waste. Efforts to minimize the amount of waste as well as to properly manage it are incorporated into all alternatives; therefore, we do not have any specific recommendations to further reduce these impacts. We encourage continued communication with interested stakeholders, particularly nearby residents and area users to ensure effective participation in the NEPA process.

Again, we appreciate the opportunity to offer comments on the Draft EIS. Please contact me at (206) 553-1601 or by email at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov) with any questions you have regarding our comments.

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly legible.

Christine B. Reichgott, Manager  
Environmental Review and Sediments Management Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment, February, 1987.